

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BETTY ANNE WATERS, as  
Administratrix of the Estate of  
KENNETH WATERS,

Plaintiff,

v.

TOWN OF AYER, NANCY TAYLOR-  
HARRIS, in her individual capacity, ARTHUR  
BOISSEAU, in his individual capacity,  
BUDDY DECOT, in his individual capacity,  
WILLIAM ADAMSON, in his individual  
capacity, PHILIP L. CONNORS, in his  
individual capacity, and JOHN DOE and JANE  
DOES 1-16, in their individual capacities,

Defendants.

Case No. 04 Civ. 10521 (GAO)

**PLAINTIFF'S SUPPLEMENTAL  
RESPONSE TO DEFENDANTS' FIRST  
SET OF INTERROGATORIES**

Comes Now Plaintiff and offers supplemental responses to the following interrogatories from Defendants' First Set of Interrogatories. By further responding to these requests for production, plaintiff does not waive any privileges or objections.

2. Please provide a complete and detailed recitation of the decedent's educational history, commencing with high school, indicating all degrees or certificates conferred, and dates of same.

**RESPONSE:** Kenny Waters obtained a GED in 1976. He was in the process of applying to New England Tech for refrigeration/air-conditioning at the time of his arrest. He obtained certificates for automotive theory (1989, 1990), culinary arts (1988), oil heating (1984),

air conditioning and refrigeration (1984), and drafting technology (1984) while in prison. He was also ordained as a minister (1996) and awarded a Certificate of Distinction (1986) during his incarceration. See documents attached as Exhibit A.

19. Please set forth the factual basis for your contention that “[t]he APD officers, and specifically defendant Taylor knew or should have known that [the testimony of Roseanna Perry inculcating the decedent] was false,” as set forth in Paragraph 55 of the Complaint.

RESPONSE: In addition to the elements described in her previous response to this interrogatory, plaintiff directs defendants’ attention to the attached affidavit by Rose Perry. See document attached as Exhibit B.

Respectfully submitted,

Dated: August \_\_, 2005

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